1	J. Gary Gwilliam, Esq. (State Bar No. 33430)		
2	Randall E. Strauss, Esq. (State Bar No. 168363) Jayme L. Walker, Esq. (State Bar No. 273159)		
3	Angelina M. Austin, Esq. (SBN 336250) GWILLIAM, IVARY, CHIOSSO, CAVALLI & BREWER		
4	1999 Harrison Street, Suite 1600		
5	Oakland, CA 94612-3528 Telephone: (510) 832-5411		
6	Facsimile: (510) 832-1918		
7	Email: ggwilliam@giccb.com; rstrauss@giccb.com; jwalker@giccb.com; aaustin@giccb.com		
8	Attorneys for Plaintiffs	oo, Chipigania De En ippo, %	
	EDUARDO OUINTANAR, JR.		
9	LINITED STATES	S DISTRICT COURT	
10			
11	EASTERN DISTRICT OF CALIFORNIA		
12	ESTATE OF FRANK CARSON AND	Case No. 1:20-CV-00747-TLN-BAM	
13	GEORGIA DEFILIPPO, as an individual and as successor in interest to FRANK	JOINT STIPULATION AND	
14	CARSON,	ORDER TO CONTINUE OPPOSITION AND REPLY DATES IN CONNECTION	
15	Plaintiffs,	WITH DEFENDANTS' MOTIONS TO	
16	vs.	DISMISS	
17	COUNTY OF STANISLAUS, CITY OF	Related to: 1:15-cv-00311-TLN-BAM (Athwal)	
18	MODESTO, BIRGIT FLADAGER,	1:20-cv-00770-TLN-BAM (Wells/McFarlane)	
19	MARLISSA FERREIRA, DAVID HARRIS; KIRK BUNCH, STEVE JACOBSON, JON		
20	EVERS, CORY BROWN, and DOES 1-25,		
	inclusive,		
21	Defendants.		
22	GEORGIA DEFILIPPO AND CHRISTINA		
23	DEFILIPPO,		
24	Plaintiffs,		
25	VS.	Case No. 1:18-cv-00496-TLN-BAM	
26	COUNTY OF STANISLAUS, et al.		
27	COUNTY OF STAINISLAUS, et al.		
28	JOINT STIP. AND ORDER TO CONT. OPP.	1 CASE No. 1:20-cv-00747-TLN-BAM	

CASE No. 1:18-CV-00496-TLN-BAM

CASE No. 1:18-CV-01403-TLN-BAM

AND REPLY DATES IN CONNECTION

WITH DEFS' MTDs

Case 1:20-cv-00747-TLN-BAM Document 58 Filed 02/02/22 Page 1 of 10

A Professional Corporation 1999 Harrison St., Suite 1600, Oakland, CA 94612 **ATTORNEYS AT LAW**

Case 1:20-cv-00747-TLN-BAM Document 58 Filed 02/02/22 Page 2 of 10

1	Defendants.		
2	EDUARDO QUINTANAR, JR.,		
3	Plaintiff,		
4	vs.		
5	COUNTY OF STANISLAUS, et al.	Case No. 1:18-cv-01403-TLN-BAM	
6	Defendants.		
7			
8	On November 13, 2020, the Honorable	Judge Nunley consolidated this matter with	
9	related cases DeFilippo, et al v. Stanislaus et al	l, USDC No. 1:18-cv-00496; Quintanar v.	
10	Stanislaus, et al, USDC No. 1:18-cv-01403; Wo	ells, et al v. Stanislau,s et al, USDC No. 1:20-cv-	
11 12	00770; and Athwal, et al v. Stanislaus et al USDC No. 1:15-cv-0031, for discovery purposes		
13	(Docket #23 of <i>Carson</i> , <i>et al.</i>). The parties in these matters filed a stipulation and proposed		
14	order continuing the respective opposition and reply dates in relation to the Defendants'		
15	Motions to Dismiss, in related case Athwal et al v. Stanislaus et al, USDC No. 1:15-cv-0031		
16	(Docket #175). That stipulation, attached here as Exhibit A , is a true and accurate copy of the		
17	parties' Joint Stipulation and Proposed order to continue dates in all of the related cases.		
18			
19			
20	DATE: February 1, 2022 G	WILLIAM, IVARY, CHIOSSO, CAVALLI & BREWER	
21			
22		/s/ Angelina M. Austin J. Gary Gwilliam	
23		Randall E. Strauss	
24		Jayme L. Walker Angelina m. Austin	
25		Attorneys for Plaintiff FRANK CARSON	
26			
27			
28	JOINT STIP. AND ORDER TO CONT.	2 CASE No. 1:20-CV-00747-TLN-BAM	

A Professional Corporation 1999 Harrison St., Suite 1600, Oakland, CA 94612

Exhibit A

JOINT STIP. AND ORDER TO CONT. OPP. AND REPLY DATES IN CONNECTION WITH DEFS' MTDs

CASE NO. 1:20-CV-00747-TLN-BAM CASE NO. 1:18-CV-00496-TLN-BAM

CASE No. 1:18-CV-01403-TLN-BAM

	Case 1:20-cv-00747-TLN-BAM Document 58	Filed 02/02/22 Page 4 of 10			
	Case 1:15-cv-00311-TLN-BAM Document 175	5 Filed 02/01/22 Page 1 of 6			
	ARTURO J. GONZÁLEZ (CA SBN 121490)				
AGonzalez@mofo.com JESSICA L. GRANT (CA SBN 178138)					
JGrant@mofo.com MATTHEW A. CHIVVIS (CA SBN 251325)					
MChivvis@mofo.com ROBERT S. SANDOVAL (CA SBN 311032)					
RSandoval@mofo.com MEREDITH L. ANGUEIRA (CA SBN 333222) MAngueira@mofo.com MORRISON & FOERSTER LLP 425 Market Street San Francisco, California 94105-2482 Telephone: 415.268.7000					
				Attorneys for Plaintiffs	
				BALJIT ATHWAL, DALJIT ATWAL, WALTER and SCOTT McFARLANE	W. WELLS
UNITED STATES DISTRICT COURT					
EASTERN DISTRICT OF CALIFORNIA					
	BALJIT ATHWAL and DALJIT ATWAL,	Case No. 1:15-cv-00311-TLN-BAM			
	Plaintiffs,	JOINT STIPULATION AND			
	V.	[PROPOSED] ORDER TO CONTINUE OPPOSITION AND			
	COUNTY OF STANILSAUS; CITY OF TURLOCK; CITY OF MODESTO; CITY OF	REPLY DATES IN CONNECTION WITH DEFENDANTS' MOTIONS TO DISMISS			
	CERES; STANISLAUS COUNTY OFFICE OF				
	THE DISTRICT ATTORNEY; KIRK BUNCH; JON EVERS; TIMOTHY REDD; DALE	Hon. Troy L. Nunley			
	LINGERFELT; STEVE JACOBSON; BIRGIT FLADAGER; GALEN CARROLL;	Trial: None Set			
	Defendants.	Related to: CASE NO. 1:20-CV-00770-TLN-BAM			
		CASE NO. 1:20-CV-00747-TLN-BAM CASE NO. 1:18-cv-00496-TLN-BAM			
		CASE NO. 1:18-cv-01403-TLN-BAM			
		Case No. 1:20-cv-00770-TLN-BAM			
	WALTER W. WELLS and SCOTT MCFARLANE	Case No. 1.20 ev 007/0 1EN Britis			
	WALTER W. WELLS and SCOTT MCFARLANE Plaintiffs,	Case No. 1.20 ev 00770 TEN Brill			
	MCFARLANE	Case No. 1.20 ev 00770 TEN Brill			
	MCFARLANE Plaintiffs,	Case No. 1.20 ev 00770 TEN Brill			

CASE No. 1:15-cv-00311-TLN-BAM sf-4684591

	Case 1:20-cv-00747-TLN-BAM Document 58	Filed 02/02/22 Page 5 of 10
	Case 1:15-cv-00311-TLN-BAM Document 175	Filed 02/01/22 Page 2 of 6
1	FRANK CARSON,	Case No. 1:20-cv-00747-TLN-BAM
2	Plaintiffs,	
3	V.	
4	COUNTY OF STANISLAUS, CITY OF MODESTO, CITY OF CERES, BIRGIT	
5	FLADAGER, MARLISSA FERREIRA, DAVID	
6	HARRIS, KIRK BUNCH, STEVE JACOBSON, JON EVERS, CORY BROWN, and DEREK	
7	PERRY, and DOES 1-25, inclusive,	
8	Defendants.	
9	GEORGIA DEFILIPPO AND CHRISTINA DEFILIPPO	Case No. 1:18-cv-00496-TLN-BAM
10	Plaintiffs,	
11	v.	
12	COUNTY OF STANISLAUS, ET AL.	
13	Defendants.	
14	EDUARDO QUINTANAR, JR.,	Case No. 1:18-cv-01403-TLN-BAM
15	Plaintiffs,	
16	V.	
17	COUNTY OF STANISLAUS, ET AL.	
18	Defendants.	
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	STIPULATION & [PROPOSED] ORDER TO CONTINUE OPPOSITION AND F DISMISS CASE NO. 1:15-CV-00311-TLN-BAM sf-4684591	REPLY DATES IN CONNECTION WITH DEFENDANTS' MOTIONS TO 2

	Case 1:20-cv-00747-TLN-BAM Document 58 Filed 02/02/22 Page 6 of 10	
	Case 1:15-cv-00311-TLN-BAM Document 175 Filed 02/01/22 Page 3 of 6	
1	Defendants COUNTY OF STANISLAUS; CITY OF MODESTO; CITY OF TURLOCK	
2	CITY OF CERES; STANISLAUS COUNTY OFFICE OF THE DISTRICT ATTORNEY;	
3	BIRGIT FLADAGER; MARLISSA FERREIRA; DAVID HARRIS; KIRK BUNCH; STEVE	
4	JACOBSON; CORY BROWN; JON EVERS; TIMOTHY REDD; DALE LINGERFELT;	
5	GALEN CARROL; FROLIAN MARISCAL; LLOYD MCKINNON; GREG JONES;	
6	KENNETH BARRINGER; GALEN CARROLL; FRANK NAVARRO; and TIMOTHY REDI	
7	("Defendants") and Plaintiffs ESTATE OF FRANK CARSON; GEORGIA DEFILIPPO;	
8	CHRISTINA DEFILIPPO; EDUARDO QUINTANAR, JR.; BALJIT ATHWAL; DALJIT	
9	ATHWAL; WALTER WELLS; and SCOTT MCFARLANE ("Plaintiffs") through their	
10	respective counsel, hereby agree and stipulate as follows:	
11	1. WHEREAS Plaintiffs have been served with multiple separate motions to dismis	
12	2. WHEREAS Plaintiffs would like additional time to confer with Defendants and	
13	possibly dismiss certain claims against certain Defendants;	
14	3. All parties agree that the deadline for opposing Defendants' motions to dismiss l	
15	continued to April 11, 2022;	
16		
17	4. Defendants' reply briefs shall be filed no later than May 26, 2022.	
18	The stipulated briefing schedule is as follows:	
19	Plaintiffs' Oppositions to Defendants' FRCP April 11, 2022	
20	12(b)(6) motions to dismiss Defendants' Parlies (if any) May 26, 2022	
21	Defendants' Replies (if any) May 26, 2022 Proposed hearing date June 9, 2022 at 2 p.m.	
22	respond nothing unit	
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	Case 1:20-cv-00747-TLN-BAM	Document 58 Filed 02/02/22 Page 7 of 10
	Case 1:15-cv-00311-TLN-BAM	Document 175 Filed 02/01/22 Page 4 of 6
1		Respectfully submitted,
2	Dated: February 1, 2022	ARTURO J. GONZÁLEZ JESSICA L. GRANT
3		MATTHEW CHIVVIS ROBERT S. SANDOVAL
4		MEREDITH L. ANGUEIRA MORRISON & FOERSTER LLP
5		
6		By: <u>/s/ Arturo J. González</u> ARTURO J. GONZÁLEZ
7		ARTURO J. GONZÁLEZ
8		Attorneys for Plaintiffs BALJIT ATHWAL, DALJIT ATWAL, WALTER WELLS, AND SCOTT MCFARLANE
10	Dated: February 1, 2022	ALLEN, GLAESSNER,HAZELWOOD &
11	Dated. February 1, 2022	WERTH, LLP
12		
13		By: */s/ Patrick Moriarty DALE L. ALLEN, JR.
14		PATRICK D. MORIARTY JOHN B. ROBINSON
15		Attorneys for Defendants
16 17		CITY OF MODESTO, JON EVERS, and GALLEN CARROLL
18	Dated: February 1, 2022	GWILLIAM, IVARY, CHIOSSO, CAVALLI
19	Dated. February 1, 2022	&BREWER
20		
21		By: */s/ Angelina Austin J. Gary Gwilliam
22		Randall E. Strauss Jayme L. Walker
23		Angelina M. Austin
24		Attorneys for Plaintiffs ESTATE OF FRANK CARSON, GEORGIA
25		DEFILIPPO, CHRISTINA DEFÍLIPPO AND EDUARDO QUINTANAR, JR.
26		
27		
28		

	Case 1:20-cv-00/4/-TLN-BAM Docum	nent 58 Filed 02/02/22 Page 8 of 10
	Case 1:15-cv-00311-TLN-BAM Docum	nent 175 Filed 02/01/22 Page 5 of 6
1	Dated: February 1, 2022	PORTER SCOTT A PROFESSIONAL CORPORATION
2		
3		By: */s/.John Whitefleet
4		By: */s/ John Whitefleet John R. Whitefleet
5		Attorneys for Defendants COUNTY OF STANISLAUS, STANISLAUS
6		COUNTY OFFICE OF THE DISTRICT ATTORNEY, BIRGIT FLADAGER,
7 8		MARLISSA FERRIERA, DAVID HARRIS, KIRK BUNCH, STEVE JACOBSON, CORY BROWN, DALE LINGERFELT, FROLIAN
9		MARISCAL, LLOYD MACKINNON, GREG JONES, KENNETH BARRINGER
10	Dated: February 1, 2022	ARATA SWINGLE VAN EGMOND & HEITLINGER
11		
12		By: */s/ Bradley Swingle
13		Bradley J. Swingle
14		Attorneys for Defendants
15		CITY OF TURLOCK, CITY OF CERES, FRANK NAVARRO, AND TIMOTHY REDD
16		
17	* Parties have consented to use of their ele	ectronic signature.
18		
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STIPULATION & [PROPOSED] ORDER TO CONTINUE OPPOSITION AND REPLY DATES IN CONNECTION WITH DEFENDANTS' MOTIONS TO DISMISS

CASE No. 1:15-cv-00311-TLN-BAM 5
sf-4684591

	Case 1:20-cv-00747-TLN-BAM Document 58 Filed 02/02/22 Page 9 of 10		
	Case 1:15-cv-00311-TLN-BAM Document 175 Filed 02/01/22 Page 6 of 6		
1	[PROPOSED] ORDER		
2	Pursuant to the stipulation of the parties:		
3	The stipulated briefing schedule is as follows:		
4	Plaintiffs' Oppositions to Defendants' FRCP	April 11, 2022	
5	12(b)(6) motions to dismiss Defendants' Replies (if any)	May 26, 2022	
6		June 9, 2022 at 2 p.m.	
7	Troposed flearing date	vane 9, 2022 at 2 p.m.	
8	IT IS SO ORDERED.		
9	Dated:, 2022 By:		
10	Dis	trict Judge Troy L. Nunley	
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STIPULATION & [PROPOSED] ORDER TO CONTINUE OPPOSITION AND REPLY DATES IN CONNECTION WITH DEFENDANTS' MOTIONS TO DISMISS

CASE No. 1:15-cv-00311-TLN-BAM 6
sf-4684591

GWILLIAM IVARY CHIOSSO CAVALLI & BREWER ATTORNEYS AT LAW A Professional Corporation 1999 Harrison St., Suite 1600, Oakland, CA 94612

ORDER

Pursuant to the stipulation of the parties:

The briefing schedule is as follows:

Plaintiffs' Oppositions to Defendants' FRCP 12(b)(6) motions to dismiss	April 11, 2022
Defendants' Replies (if any)	May 26, 2022
Hearing date	June 16, 2022, at 2 p.m.

IT IS SO ORDERED.

Dated: February 1, 2022

Troy L. Nunley

United States District Judge